

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
WACO DIVISION**

Midas Green Technologies, LLC,

Plaintiff,

- vs. -

Rhodium Enterprises, Inc.;

Rhodium Technologies LLC;

Rhodium 10mw LLC;

Rhodium 2.0 LLC;

Rhodium 30mw LLC;

Rhodium Encore LLC;

Rhodium Renewables LLC;

Rhodium Renewables Sub LLC;

Rhodium Ready Ventures LLC

Defendants.

Civil Action No. 6:22-cv-00050-ADA

Jury Trial Demanded

**JOINT MOTION TO ENTER
AGREED PROTECTIVE ORDER**

The parties respectfully request that the Court enter the proposed Protective Order attached as Exhibit A.

Dated: June 6, 2023

/s/ Melissa R. Smith

Melissa R. Smith
State Bar No. 24001351
melissa@gillamsmithlaw.com
GILLAM & SMITH LLP
303 South Washington Avenue
Marshall, TX 75670
Telephone: 903.934.8450
Facsimile: 903.934.9257

Elizabeth R. Brannen
California State Bar No. 226234
STRIS & MAHER LLP
777 S. Figueroa St, Ste 3850
Los Angeles, CA 90017
Telephone: (213) 995-6800
Fascimile: (213) 216-0299
Email: ebrannen@stris.com

Attorneys for Defendants Rhodium Enterprises, Inc., Rhodium Technologies LLC, Rhodium 10MW LLC, Rhodium 2.0 LLC, Rhodium 30MW LLC, Rhodium Encore LLC, Rhodium Renewables LLC, Rhodium Renewables Sub LLC; and Rhodium Ready Ventures LLC

Respectfully submitted,

/s/ Michael C. Smith

Michael C. Smith
SCHEEF & STONE, LLP
State Bar No. 18650410
113 East Austin Street
Marshall, Texas 75670
Office: (903) 938-8900

Joseph E. Thomas
Joseph E. Thomas (admitted p.h.v.)
William J. Kolegraff (admitted p.h.v.)
Grant J. Thomas (admitted p.h.v.)
THOMAS WHITELAW & KOLEGRAFF LLP
18101 Von Karman Ave., Suite 230
Irvine, California 92612
Telephone: (949) 679-6400
Fax: (949) 679-6405
jthomas@twtlaw.com
bkolegraff@twtlaw.com
gthomas@twtlaw.com

Henry M. Pogorzelski
Texas Bar No. 24007852
K&L Gates LLP
2801 Via Fortuna, Suite 650
Austin, Texas 78746
Telephone: (512) 482-6800
Fax (512) 482-6859
Henry.pogorzelski@klgates.com

Counsel for Plaintiff
Midas Green Technologies, LLC

CERTIFICATE OF CONFERENCE

The undersigned certifies that, on June 2, 2023, he met and conferred with counsel for Defendants and Defendants agrees to the relief requested herein.

/s/ Michael C. Smith
Michael C. Smith

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a) on June 6, 2023. As such, this document was served on all counsel who are deemed to have consented to electronic service. Local Rule CV-5(a)(3)(A).

/s/ Michael C. Smith
Michael C. Smith